

AAFA

2001-014-873

American Apparel & Footwear Association
the fashion association

July 6, 2001

General Services Administration
FAR Secretariat (MVP)
1800 F Street, NW, Room 4035
Attn: Laurie Duarte
Washington, DC 20405

RE: FAR CASE 2001-014 (Proposed revocation)

Dear Ms. Duarte:

The American Apparel and Footwear Association (AAFA), which represents more than 600 manufacturers in the U.S. and whose membership accounts for more than \$225 billion in annual U.S. sales, is pleased to have the opportunity to comment on Federal Acquisition Regulation (FAR) Case 2001-014 (Proposed Revocation) regarding contractor responsibility.

AAFA strongly supports the proposed rule to revoke the so-called "Blacklisting" rule that appeared in the Federal Register on December 20, 2000 (Volume 65, Number 245, pages 80255-80266).

AAFA supports this action based on its earlier comments regarding the Blacklisting rule, which focused on three basic premises, that:

- a.) AAFA believed that the December 20th rule expanded, rather than clarified, the FAR standard and that this expansion was unwarranted;
- b.) AAFA was concerned with the idea that a contracting officer must consider "all relevant information" when deciding on awards, without defining the terms "relevant" and "credible", and;

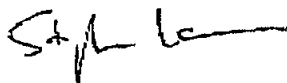
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- c.) AAFA was concerned with the introduction of subjective pressures into the contracting process, and that permitting and/or requiring the use of such subjective criteria violates basic tenets of due process and transparency and has no place in the contracting process.

AAFA and its members agree that businesses that do not maintain a satisfactory record of integrity and business ethics should not be awarded government contracts. However, we believe that rules such as Blacklisting hinder, rather than help, the government in maintaining transparent operations.

AAFA strongly endorses the revocation of the December 20, 2000 "Blacklisting" rule.

Sincerely,



Vice President